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Counsel for Plaintiff

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

HAKKASAN Limited, a United Kingdom limited liability company,

Plaintiff,

VS.

KILO CLUB, LLC, a Nevada limited liability company,

Defendant.

Case No. 2:22-cv-01695-APG-EJY

STIPULATED [PROPOSED]
DISCOVERY PLAN AND
SCHEDULING ORDER
[FOURTH REQUEST]

Pursuant to this Court's order dated May 7, 2024 (ECF No. 70), Plaintiff HAKKASAN LIMITED ("Hakkasan"), by and through its counsel, the law firm of Greenberg Traurig, LLP, and Defendant KILO CLUB, LLC ("Kilo Club") by and through its counsel, Darkhorse Attorneys, hereby stipulate to the following discovery plan and scheduling order.

BACKGROUND: When this Court granted Defendant's motion to withdraw its deemed admissions, this Court reopened discovery for a period of ninety (90) days from the date that the parties would meet and confer to prepare an amended discovery plan and scheduling order. The parties met and conferred on May 16, 2024. Kara Hendricks, of Greenberg Traurig, LLP, attended on behalf of Plaintiff Hakkasan, and Andrew Connors and Nathan Lawrence attended on behalf of Defendant Kilo Club.

The parties agreed as follows:

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AMENDED SCHEDULE:

EVENT	PROPOSED DEADLINE
Amendment of Pleadings and Adding Parties	CLOSED
Exchange of Documents Relating to Damages	June 17, 2024
Expert Disclosure	July 1, 2024
Rebuttal Expert Disclosure	July 31, 2024
Close of Discovery	August 14, 2024
Dispositive Motions	September 30, 2024
Responses to Dispositive Motions	October 21, 2024
Replies in Support of Dispositive Motions	November 4, 2024

The parties stipulate that Hakkasan's pending motion for summary judgment (ECF No. 53), which was based upon Defendant's deemed admitted requests for admissions, is withdrawn without prejudice due to the Court granting Defendant's motion to withdraw its deemed admissions.

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This stipulation amends the current discovery plan and scheduling order. Matters 1 not addressed herein shall be governed by the prior discovery plan and scheduling order. 2 IT IS SO STIPULATED. 3 4 DATED this 20th day of May, 2024. DATED this 20th day of May, 2024. GREENBERG TRAURIG, LLP 5 DARKHORSE ATTORNEYS 6 /s/ Bethany L. Rabe /s/ Andrew P. Connors 7 Kara B. Hendricks, Esq. Andrew P. Connors, Esq.* Nevada Bar No. 07743 *Admitted Pro Hac Vice 8 Bethany L. Rabe, Esq. Virginia Bar No. 80248 9 Nevada Bar No. 11691 119 Tradewynd Drive, Suite B 10845 Griffith Peak Drive, Suite 600 Lynchburg, Virginia 24502 10 Greenberg Traurig, LLP 10845 Griffith Peak Drive, Suite 600, Las Vegas, Nevada 89135 (702) 792-9002 (fax) Las Vegas, Nevada 89135 **GALLIAN WELKER & ASSOCIATES** 11 Nathan E. Lawrence, Esq. Counsel for Plaintiff Hakkasan Limited Nevada Bar No. 15060 12 730 Las Vegas Boulevard South 13 Suite 104 Las Vegas, Nevada 89101 14 Counsel for Defendant Kilo Club LLC 15 16 **ORDER** 17 IT IS SO ORDERED. 18 19 DATED: May 21, 2024 20 21 22 23 24 25 26 27 28

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